

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No.: 1:23-cv-20727-RKA

RYAN BRESLOW, et al.,

Plaintiffs,

v.

MARK PHILLIPS, et al.,

Defendants.

_____/

MOVEMENTDAO, et al.,

Counterclaim-Plaintiffs,

v.

RYAN BRESLOW, et al.,

Counterclaim-Defendants.

**[PROPOSED] ORDER GRANTING MOTION TO MODIFY TEMPORARY
RESTRAINING ORDER**

THIS CAUSE having come before the Court on the Defendant and Counterclaim-Plaintiff Mark Phillips, Defendant Benjamin Reed, and Counterclaim-Plaintiff MovementDAO's (collectively, "Movants") Expedited Motion to Modify Temporary Restraining Order. This Court having considered the motion, the memoranda submitted in support of and in opposition thereto, and all other relevant factors, it is hereby

ORDERED AND ADJUDGED that:

The Motion is GRANTED.

The Order Granting the Plaintiffs' Emergency *Ex Parte* Application for Entry of Temporary Restraining Order, dated February 28, 2023 [ECF No. 18] is modified as follows:

- A. Movants may transfer \$234,035.00 on behalf of Counterclaim-Plaintiff MovementDAO to Mikhail Radin for deferred compensation Mr. Radin earned in 2022.
- B. Movants may transfer \$55,000.00 to Action Engine on behalf of MovementDAO for three months of services for which Action Engine has not been compensated.
- C. Movants may transfer \$4,527.00 to Yuri Popov on behalf of MovementDAO for one month of services for which Mr. Popov has not been compensated.
- D. Movants may transfer \$32,000.00 to Aishwarya Narayana on behalf of MovementDAO for two months of services for which Ms. Narayana has not been compensated.
- E. On May 31, 2023, Movants may transfer \$33,333.34 to Mr. Radin on behalf of MovementDAO as compensation for Mr. Radin's work in May 2023.
- F. On May 31, 2023, Movants may transfer \$30,000.00 to Evita Stenqvist on behalf of MovementDAO as compensation for Ms. Stenqvist's work in May 2023.
- G. On May 31, 2023, Movants may transfer \$16,000.00 to Ms. Narayana on behalf of MovementDAO as compensation for Ms. Narayana's work in May 2023.
- H. On May 31, 2023, Movants may transfer \$15,000.00 to Sameer Tariq on behalf of MovementDAO as compensation for Mr. Tariq's work in May 2023.
- I. On May 31, 2023, Movants may transfer \$7,715.00 to Daniel Resnick-Neillie on behalf of MovementDAO as compensation for Mr. Resnick-Neillie's work in May 2023.
- J. On May 31, 2023, Movants may transfer \$15,000.00 to Natasha Pankina on behalf of MovementDAO as compensation for Ms. Pankina's work in May 2023.

The Court further clarifies the following:

- A. Mr. Phillips may make transactions with the funds in Mr. Phillips' Investment Robinhood Account identified in the Cash Accounting submitted with the motion, provided that Mr. Phillips maintain a balance of at least \$1,123,614.24 therein.
- B. Mr. Reed may make transactions with the funds in Mr. Reed's personal Wells Fargo checking account ending in 9216 identified in the Cash Accounting submitted with the motion.

DONE AND ORDERED in Chambers at _____, Florida,
this-__ day of _____

United States District Judge

Copies furnished to: All Counsel of Record